

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221



DATE: July 29, 2003

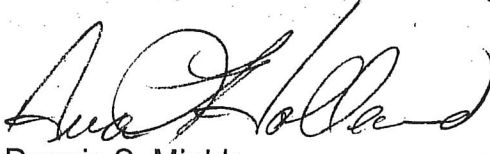
REPLY TO
ATTN OF: CBFO:QA:DSM:GS:03-2511:UFC 2300.00

SUBJECT: Closure of Corrective Action Reports 03-061 through 03-064

TO: Matthew S. McCormick, Assistant Manager, Richland Operations Office

The Carlsbad Field Office (CBFO) has completed a review of the associated objective evidence provided for the subject Corrective Action Reports (CARs). The results of the review and verification, indicate that the Hanford facility has adequately addressed the issues identified in the CARs and have taken satisfactory actions to preclude recurrence. The evaluation results and verifications are documented on the attached CAR continuation sheets. CARs 03-061 through 03-064 are now closed.

If you have any questions or comments, please contact me at (505) 234-7491.

for 
Dennis S. Miehl
Quality Assurance Specialist



Attachments

cc: w/attachments
A. Holland, CBFO *ED
M. Navarrete, CBFO *ED
K. Watson, CBFO *ED
T. Shrader, DOE-RL *ED
M. French, DOE-RL *ED
R. Dunn, FH *ED
D. DeRosa, FH *ED
J. Maupin, FH *ED
M. Eagle, EPA *ED
E. Feltcorn, EPA *ED
S. Zappe, NMED *ED
J. Channell, EEG *ED
D. Winters, DNFSB *ED
P. Rodriguez, CTAC *ED
A. Pangle, CTAC *ED
L. Greene, WRES *ED
K. Dunbar, WRES
CBFO CAR File
CBFO M&RC

030765



CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 03-061

2. Activity No.: A-03-14

3. Page 1 of 1

Block # 18 Verification of Corrective Action Completion

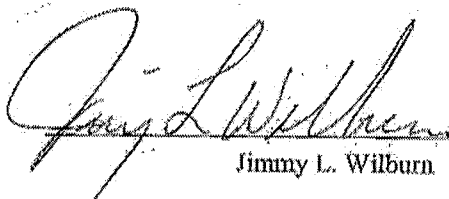
The corrective actions taken and implemented for this CAR have been completed as evidenced by review of the corrective action/objective evidence package, submitted by Hanford.

The corrective action commitments relative to *NQA-1 1989, Element 1, Organization and Element 18, Audits* as described in the Hanford Corrective Action Plan of July 11, 2003 and approved by CBFO via the, July 11, 2003 memorandum (CBFO:QA:DSM:VW:03-1586:UFC 2300), have been satisfactorily verified, and include the following:

- Documentation evidencing Hanford's implementation of their schedule for TRU Program surveillances and assessments, (i.e. Hanford Corrective Action Report No.: TRU-SPO-03-CAR-023). Procedure WMP-400, Section 3.2.1, *TRU Independent Assessments*. The SPM (Dunn) and the alternate SPM (Derosa) has been assigned the responsibility to weekly review the Commitments List to ensure that scheduled audits/surveillances have been completed as scheduled or have been appropriately dispositioned. This procedure continues to meet the requirements of the CBFO.
- Documentation evidencing that an evaluation was performed to assess the need for additional Quality Assurance resources. The results of the evaluation is that an additional Quality Engineer be added to the current Hanford Quality Assurance staff to "help with peak data review load and with planning and performance of scheduled audits and surveillances".
- Documentation evidencing that an analysis was performed by Collin Smith and a separate analysis by the SQAQ. The analyses were of WIPP shipment data for the period of impact for not having performed the audit/surveillances scheduled for February 1, 2003 to June 17, 2003. The results of the analysis were that none of the shipments performed in CY 2003 were characterized during this period.
- Documentation that Surveillance No. TRU-03-006 of the TRU Program Quality Assurance Program was performed July 7 through July 18, 2003. The surveillance identified two Observations and no Findings.
- Approved Organization Charts showing the revised Quality Assurance organization supporting the TRU Program. Revisions included having the SQAQ report directly to the Director of Quality Assurance instead of the Manager of Environmental/Science Assurance who reports directly to the Director of Quality Assurance.

Based on the above information and the supporting documentation, the recommendation is for closure of this CAR.

Block 19a Verified By:


Jimmy L. Wilburn

07/29/03
Date

Block 19b Trend Cause Code: 6.5

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 03-062

2. Activity No.: A-03-14

3. Page ___ of ___

Block # 18 Verification of Corrective Action Completion

The corrective actions taken and implemented for this CAR have been completed as evidenced by review of the corrective action and objective evidence package, submitted by Hanford (via 7/25/03, memorandum, WMD:TAS/03-WMD-0266).

The corrective action commitments relative the *Remedial, Investigative, and Actions to Preclude Recurrences* described in the Hanford corrective action plan of July 11, 2003 and approved by CBFO via the July 11, 2003 memorandum (CBFO:QA:DSM:VW:03-1586:UFC 2300), have been satisfactorily verified, and include the following:

- Documentation, (i.e., letter and lists of randomly selected containers), evidencing Hanford's selection of a container from the S5000 matrix parameter category for VE for fiscal year 2002, and replacement for drum RHZ-231-A17783. (M4T00-DCD-03-188, June 25, 2003)
- Hanford project engineers' confirmation, dated June 17, 2003; indicating that selection and VE of an alternate waste container (drum RHZ-212-A19843) is complete. The signed VE drum log for drum RHZ-212-A19843 is also attached to this confirmation.
- Procedure WMP-400, Section 7.1.4, R12 - *Sampling Design and Data Analysis for RCRA Characterization and Visual Examination of Transuranic Waste* - was revised to ensure that containers that are rejected during the RTR process are not selected and sent for VE as the over-check of the RTR process. Revision 12 to this procedure became effective and was approved by CBFO on June 17, 2003 via memorandum of same date. (CBFO:NTP:KWW:VW:03-2391:UFC:5822)
- Documentation, (Fluor memorandum dated July 24, 2003, TRU-SPO-03CAR-020), evidencing Fluor Hanford's completion of investigative analysis and action. The investigative analysis confirms CBFO's initial determination of a "non-significant" deficiency.
- Hanford Corrective Action Report No. TRU-SPO-03CAR-020 R1, reiterates CBFO CAR 03-062, was satisfactorily resolved and closed July 23, 2003.

Based on the above information and the supporting documentation, the recommendation is for closure of this CAR.

Block 19a Verified By:

 for
Karen Gaydosh

07/29/03
Date

Block 19b Trend Cause Code: 6.5

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 03-063

2. Activity Report No. A-03-14

3. Page Of

Block # 18 Verification of Corrective Action Completion

The corrective actions taken and implemented for CAR 03-063 have been completed as evidenced by review of the corrective action/objective evidence package, submitted by Hanford via DOE Richland Operations Office memorandum (WMD:TAS/03-WMD-0266) dated July 25, 2003.

The corrective action commitments relative the *Remedial, Investigative, and Actions to Preclude Recurrence* as described in the Hanford corrective action plan of July 7, 2003 and approved by CBFO via the July 11, 2003 memorandum (CBFO:QA:DSM:VW:03-1586:UFC 2300), have been satisfactorily verified.

Documentation reviewed for closeout of CAR 03-063 was contained in an attachment to the DOE Richland Operations memorandum WMD:TAS/03-WMD-0266 as "Corrective Action Report 03-063 and attached FLUOR Memorandum M4T00-DCD-03-219 from K. A. Smith to G. A. Valante dated July 16, 2003 and included the following:

- Documentation (i.e. Hanford email from Kathryn A. Smith to David C. DeRosa and Richard Dunn dated June 27, 2003). This documentation acknowledges the fact that Hanford received direction in the past not to change out a debris seal on a WIPP Training Unit and an ICV debris seal was never replaced on a WIPP shipment at Hanford because the WRAP Loadout Operations Crew never came across a faulty seal that required replacement.
- Revised and approved TRU Waste TRUPACT-II Qualification Cards for Millwright, T2 Loadout Operator (NCO), and Crane Operator. These revised Qualification Cards included knowledge elements in accordance with DOE/WIPP 02-3183, Attachment C, Section II, Knowledge.
- Completed TRU Waste TRUPACT-II Qualification Cards were provided for a Millwright, Crane Operator and Loadout Operator (NCO) for Section II, Knowledge and Section II, Operations. The Qualification Card for the Millwright demonstrated performance replacement of a debris seal.
- A TRU Program Compliance Calendar for CY 2003 and 2004 was submitted and contained scheduled Semi-Annual Review of TRUPACT-II Loadout Personnel Training Requirements.

Based on the above information and the supporting documentation, the recommendation is for closure of this CAR.

Block 19a Verified By:


L. Dee Scott/Todd Sellmer

07/28/03

Date

Block 19b Trend Cause Code: 6.5 Policy not adequately defined, disseminated or enforced

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 03-064

2. Activity No.: A-03-14

3. Page ___ of ___

Block # 18 Verification of Corrective Action Completion

The corrective actions taken and implemented for this CAR 03-064 have been completed as evidenced by review of the corrective action/objective evidence package, submitted by Hanford (via July 25, 2003, memorandum, WMD:TAS/03-WMD-0266).

The corrective action commitments relative the *Remedial, Investigative, and Actions to Preclude Recurrence* as described in the Hanford Corrective Action Plan of July 11, 2003 and approved by CBFO via the, July 11, 2003 memorandum (CBFO:QA:DSM:VW:03-1586:UFC 2300), have been satisfactorily verified, and include the following:

- Documentation evidencing Hanford's implementation of their AK Accuracy Report, (i.e. Hanford Corrective Action Report No.: TRU-SPO-03-CAR-022 R2). Procedure WMP-400, Section 7.1.9, *Acceptable Knowledge Documentation Management* was revised to define a frequency for completion of an AK Accuracy Report. This procedure continues to meet the requirements of the *Hazardous Waste Facility Permit* "Waste Analysis Plan" and other CBFO requirements.
- Documentation evidencing an added requirement to WMP-400, Section 7.1.9 for SQAQO to provide along with each AK Accuracy Report, a summary memo indicating number of containers that change waste stream due to characterization.
- Documentation providing an outline of the topics discussed during a briefing regarding the WIPP Hazardous Waste Permit requirements for AK accuracy requirements. The course completion roster of the Site Quality Assurance Officer and the TRU Program Acceptable Knowledge Statistical Analyst is also documented.
- Documentation providing the AK Accuracy Report is performed to the revised procedure, WMP-400, Section 7.1.9, *Acceptable Knowledge Documentation Management*. Also, a list of containers that have been placed in the MPFPD waste stream prior to AK Confirmation and the AK Performance Report.
- Documentation providing the performance of investigative action was taken to determine the impact of the AK Accuracy Report.

Based on the above information and the supporting documentation, the recommendation is for closure of this CAR.

Block 19a Verified By:


Dick Blauvelt/Prissy Dugger

7/29/03
Date

Block 19b Trend Cause Code: 2.1